

EXHIBIT D TO SC LBR 9013-4

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

IN RE:

**Thomas Levi Boyd
385 Morrisville Road
Andrews, SC 29510**

CASE NO: 13-02924 JW

CHAPTER: 13

NOTICE OF MOTION/APPLICATION
AND OPPORTUNITY FOR HEARING

DEBTOR(S)

Last four digits of Social-Security or
Individual Tax-Payer-Identification (ITIN)
No(s)., (if any): xx 8149

NOTICE OF MOTION TO RE-OPEN CHAPTER 13

Thomas Levi Boyd has filed papers with the court for a MOTION TO REOPEN CHAPTER 13 BANKRUPTCY CASE FOR THE SOLE PURPOSE TO FILE AN APPLICATION TO EMPLOY, MARK BRINGARDNER, AND AMENDED SCHEDULES.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant relief sought in this motion, or you want the court to consider your views on the motion then within (14) days of service of this notice, you or your attorney must:

File with the court a written response, return, or objection at:

1100 Laurel Street
Columbia, SC 29201

Responses, returns, or objections filed by an attorney must be electronically filed in ecf.scb.uscourts.gov.

If you mail your response, return, or objection to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also send a copy to:

Jason T. Moss, Attorney for Debtor 816 Elmwood Avenue Columbia, SC 29201 and

Thomas Levi Boyd 385 Morrisville Road Andrews, SC 29510

Attend the hearing scheduled to be heard on **April 2, 2020 at 10:00 a.m.** at the United States Bankruptcy Court, 145 King Street, Room 225 Charleston, SC 29401.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: March 5, 2020

/s/ Jason T. Moss

Jason T. Moss

Moss & Associates, Attorneys, P.A.

Attorney for Movant/Movant

D.C. ID# 7240

816 Elmwood Avenue

Columbia, S.C. 29201

(803) 933-0202

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In Re:)	
Thomas Levi Boyd)	Case No. 13-02924/ jw
)	
)	Chapter 13
Debtor(s).)	
_____)	

**MOTION TO REOPEN CHAPTER 13 BANKRUPTCY CASE FOR THE SOLE
PURPOSE TO FILE AN APPLICATION TO EMPLOY AND AMENDED SCHEDULES**

The Debtor, by and through his undersigned counsel, hereby moves before this Court to reopen the Chapter 13 bankruptcy case. In support of this Motion, the Debtor would show unto the court the following:

1. Debtor filed a Petition for Relief under Chapter 13 of the Bankruptcy Code on or about May 16, 2013.
2. Pamela Simmons-Beasley was appointed Chapter 13 Trustee.
3. Mr. Boyd was involved in a car accident post-petition, June 23, 2017. Debtor retained a personal injury attorney in June, 27, 2017.
4. The personal injury case has not been settled. This case is still in the process of trial. However, Debtor moves to reopen his case so that he can file an Application to Employ, Mark Bringardner, and Amended Schedules in good faith.
5. Mr. Boyd received a successful discharge on September 6, 2018.
6. The Debtor respectfully requests to have his Chapter 13 Bankruptcy case reopened in order to proceed with filing an Application to Employ, Mark Bringardner, and Amended Schedules.
7. Based on the foregoing, the Debtor respectfully requests that the Chapter 13 Bankruptcy case be reopened.

WHEREFORE, the Debtor moves before this Court to Reopen the Chapter 13 and for such other and further relief as this Court may deem just and proper.

Respectfully submitted.

Moss & Associates, Attorneys, P.A.

By: /s/ Jason T. Moss

Jason T. Moss, Esq.
Federal I.D. No. 7240
816 Elmwood Avenue
Columbia, SC 29201
Attorney for the Debtor

Columbia, South Carolina
March 5, 2020

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In Re:)	
Thomas Levi Boyd)	Case No. 13-02924/ jw
)	
)	Chapter 13
Debtor(s).)	
_____)	

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on today's date, I served, on the persons and addresses below, First Class U.S. Mail and served the Trustee by CM/ECF, the Debtors Motion to Reopen.

Pamela Simmons-Beasley ECF
Chapter 13 Trustee

See Attached List

Heather S Bailey
Bailey Law Offices, LLC
PO Box 60821
North Charleston, SC 29419
Email: Heather@bankruptcybailey.com

JOYE LAW FIRM
Mark Bringardner | Attorney
5861 Rivers Avenue
North Charleston, SC 29406

PIERCE SLOAN WILSON
KENNEDY & EARLY, LLC
321 East Bay Street
Post Office Box 22437
Charleston, SC 29401
Carl E. Pierce, II (7946)
Carson R. Parker (103322)
Attorneys for Defendant Roy Laverne Bolyn

GALLIVAN, WHITE & BOYD, P.A.

John A. "Jay" Jones, SC Bar# 73091

Paige C. Ornduff, SC Bar # 102338

PO Box 22768

Charleston, SC 29413

Attorneys for Thompson Construction Group, Inc.

SMITH ROBINSON HOLLER

DUBOSE & MORGAN, LLC

G. Murrell Smith, Jr. (66263)

126 N. Main St.

Sumter, SC 29151

Attorney for Thompson Construction Group, Inc.

Moss & Associates, Attorneys PA

By: /s/ Chi Anne S. Walling

Chi Anne S. Walling

Bankruptcy Paralegal

816 Elmwood Avenue

Columbia, SC 29201

(803) 933-0202

Columbia, South Carolina

March 6, 2020